

CHAPTER 9:

The PrintSTEP Application Process

Submitting Your PrintSTEP Application

After completing Chapters 1 through 8, you are now ready to submit your PrintSTEP Application. Complete the following:

- ⇒ Using the waste water, storm water, hazardous waste, and air emissions worksheets (or tables) you just checked off, complete the PrintSTEP application form in Appendix I.
- ⇒ Remember to consider future growth. For example, if you are currently a Small Quantity Generator but you are very close to being a Full Quantity Generator, you may want to consider putting Full Quantity Generator on your PrintSTEP application.
- ⇒ Send the completed application to the State agency at:

New Hampshire Department of Environmental Services
PrintSTEP Program
6 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

PrintSTEP Information Repository

After the NH DES receives your PrintSTEP application, the completed application will be considered a public document and stored in information repositories located throughout the state.

- ⇒ The state will review your application upon receipt. If there are incomplete sections or errors, the NH DES will contact you for more information.
- ⇒ If everything is in order on your application, the state will file a copy in the PrintSTEP Information Repository.

PrintSTEP Information Repositories

The public can review copies of the application that a printer submits to the state (other than confidential business information) through the PrintSTEP "Information Repository." The purpose of the Repository is to help make the PrintSTEP process understandable and accessible to everyone. The Repository will also include copies of all public notices related to PrintSTEP. This Repository will be located at an accessible location, such as a local library or town hall. When modifications are made to an application, the state will update the repository. Call the NH DES at 1 888-270-0244 to find out about the PrintSTEP Repository.

PrintSTEP Notification Status

If you qualify for a PrintSTEP Notification status, there are no additional requirements associated with your PrintSTEP application. Also, the only public participation will be the document on file at the information repositories.

You qualify for a **PRINTSTEP NOTIFICATION** if:

- You discharge **process WASTE WATER** to a POTW (less than 25,000 gallons per day) **or**
- You are on a POTW with no discharge **or**
- You are on a septic system with no discharges

AND

- You do not generate **HAZARDOUS WASTE** **or**
- You're a Small Quantity Generator of hazardous waste **or**
- You're a Full Quantity Generator (less than 1000 kg per month) of hazardous waste

AND

- Your **STORM WATER** is considered "No exposure"

AND

- Your **AIR EMISSIONS** are the following:
VOC: Level 1 or 2; RTAP: Level 1; and HAP: Level 1.
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Congratulations! You are now a PrintSTEP Printer.

You must now operate your facility within the thresholds of PrintSTEP Notification status and comply with all requirements.



**STOP: IF YOU QUALIFY FOR PRINTSTEP NOTIFICATION STATUS,
GO TO CHAPTER 10**

**IF YOU FALL UNDER THE PRINTSTEP AGREEMENT,
CONTINUE WITH THIS CHAPTER**

You will get a
PRINTSTEP AGREEMENT if:

- You discharge **process WASTE WATER** to a POTW (more than 25, 000 gal/day) **or**
- You require an Individual NPDES permit for your process waste water
- OR**
- You're a Full Quantity Generator (more than 1000 kg per month) of **HAZARDOUS WASTE**
- OR**
- You require a NPDES General permit for **STORM WATER**
- OR**
- Your **AIR EMISSIONS (VOC, RTAP, or HAP)** are PrintSTEP Level 3, 4, or 5

Public Participation in PrintSTEP

This is the Step where the public can get involved in the PrintSTEP process. While, PrintSTEP lays out the process for this public involvement, ultimately it is up to the public whether or not they choose to get involved. If they do not participate, the process moves forward.

In PrintSTEP, your public involvement requirements correspond to your potential environmental impact. Printers who qualify for a PrintSTEP Notification (those with the lowest emissions or wastes in all media) do not have requirements for public involvement. However, your application will be available to the public through the Information Repository. Those printers with moderate emissions

have “Limited Public Involvement” requirements. And, printers with the greatest releases have “Full Public Involvement” requirements. Determine your Public Involvement requirements using the worksheet below.

Public Involvement Requirements Worksheet

<i>check your status in each row</i>	NO Public Involvement	LIMITED Public Involvement	FULL Public Involvement
Waste Water	<input type="checkbox"/> POTW discharge and not a Significant Industrial User <input type="checkbox"/> “No exposure”	<input type="checkbox"/> POTW dischargers > 25,000 gal/day	<input type="checkbox"/> NPDES Individual permit
Storm Water	<input type="checkbox"/> NPDES General permit <input type="checkbox"/> Exempt		
Hazardous Waste	<input type="checkbox"/> no hazardous waste generation <input type="checkbox"/> Small Quantity Generator <input type="checkbox"/> Full Quantity Generator, < =1000 kg/month	<input type="checkbox"/> Full Quantity Generator, > 1000 kg/month	
Air Emissions, VOC	<input type="checkbox"/> VOC Level 1 <input type="checkbox"/> VOC Level 2	<input type="checkbox"/> VOC Level 3	<input type="checkbox"/> VOC Level 4 <input type="checkbox"/> VOC Level 5
Air Emissions, RTAP	<input type="checkbox"/> RTAP Level 1 (no permit)	<input type="checkbox"/> RTAP Level 2 (permit)	
Air Emissions, HAP	<input type="checkbox"/> HAP Level 1	<input type="checkbox"/> HAP Level 2	<input type="checkbox"/> HAP Level 3

To Determine Your Public Involvement Requirements:

- In each row, check off the status at your facility for the waste stream listed.
- If all your check marks are in the No Public Involvement column, you have no public involvement requirements.
- If you have **any** check marks in the Limited column, but none in the Full column, you have Limited Public Involvement requirements.
- If **any** of your check marks are in the Full column, you have Full Public Involvement requirements.

An Example: ABC Printing Company

- Continuing with the previous example from the ABC Printing Company, they would use the worksheet to determine their requirements for Public Involvement.
- They are a Full Quantity Generator of >1,000 kg/month of hazardous waste, therefore, they will have requirements for Limited Public Involvement.
- ABC Printing's application will be available for public review through the Information Repository.
- Note that **all** PrintSTEP applications, regardless of whether or not the printer has public involvement requirements, will be available to the public through the Information Repository.

How the Public will be Involved

The public is notified of your application and asked to comment on it, and possibly to attend a public meeting. *How* the public will be notified depends on whether you have Limited or Full Public Involvement requirements.

The PrintSTEP public participation mirrors existing NHDES requirements for printers that require permits. If you do not join PrintSTEP you will still have public participation requirements.

General Public Notice

General Notice indicates notice that is readily available and accessible to the public, so that anyone interested can find out about the PrintSTEP application. For example, a General Notice may be published in a newspaper or on the Internet. This type of notice is required as part of Limited and Full Public Involvement requirements.

Actual Public Notice

Actual Notice and General Notice are required as part of Full Public Involvement requirements. Actual Notice is when the community and registered parties are notified directly. Actual Notice may be done by hanging a sign at the facility. The PrintSTEP registry will be notified by first-class mail. See Chapter 11 for more information on how these guidelines are set.

PrintSTEP Registry

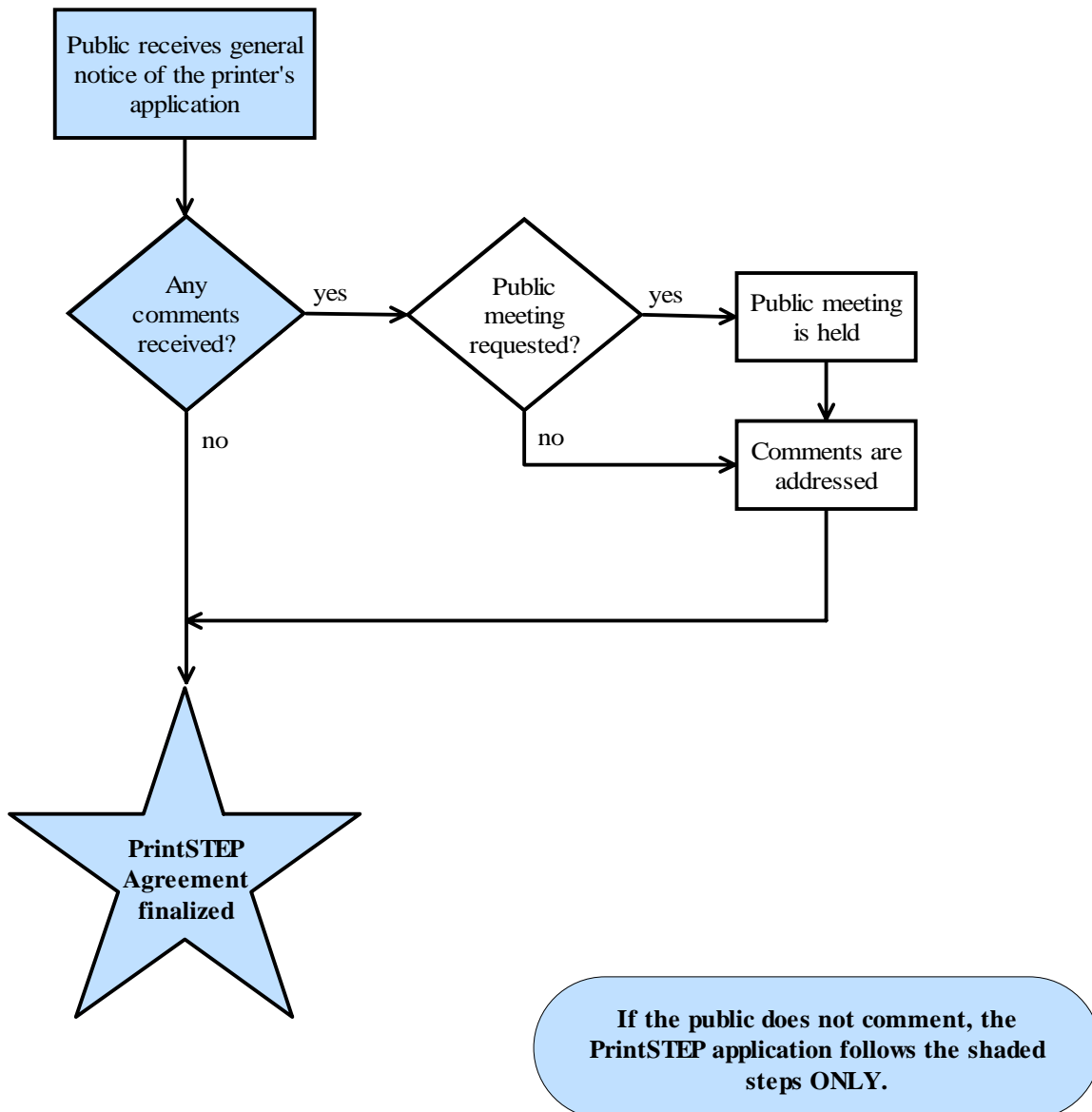
Anyone interested in the PrintSTEP process can register their name with the State. Whenever a PrintSTEP application is submitted that has public involvement requirements, appropriate registered parties will be notified about the application. Notification of registered people is *in addition to* the notification of community members. When registering, interested parties can specify if they want notification for all facilities, or only for those in a certain geographic area. Contact the NH DES at 1-888-270-0244 to register in New Hampshire.

Printers with Limited Public Involvement Requirements

See Figure 2 for an overview of the Limited Public Involvement process.

Figure 2

LIMITED Public Involvement Requirements



Printers with Limited Public Involvement Requirements (con't)

The Public Receives Notice of the Application

The public will get General Notice of your application. (Actual Notice is not required for Limited Public Involvement.) General Notice will be provided by the NH Department of Environmental Services. The notice shall be published once in a newspaper of general daily statewide circulation and placed on the internet at www.des.state.nh.us/printstep/. In addition, a copy of the notice will be sent to the applicant, an appropriate official of the city or town where the facility is (or would be) located, the local health officer, the Chamber of Commerce, and the regional planning agency. The public notice shall contain the following information: 1) name and address of applicant; 2) The location of the site or proposed site; 3) A brief description of the facility and processes; 4) The location and address where written comments and/or requests for a public meeting¹ shall be filed.

The Public Comments on the Application

What will the public comment on? The notice will ask the community and registered parties to comment on your PrintSTEP application. The public will have 30 days to submit comments to the NH Department of Environmental Services. These comments will address whether your application accurately describes your facility's environmental impact. The public can comment on any part of the application, not just the waste stream that triggered your public involvement requirements. Comments may also address issues such as sensitive environmental conditions or populations in the area, or the community may request that the state hold a public meeting to discuss the printers application. Copies of the application will be available through the PrintSTEP Information Repository. The standard regulatory requirements for each waste stream (as listed in Step 1 of this chapter) will also be available for public review from the Information Repository. These requirements will be the basis for your PrintSTEP Agreement. Community members are encouraged to review these requirements when deciding if they will comment. Written comments will be posted on the PrintSTEP internet site.

¹PrintSTEP public "meeting" includes the term "hearing" as defined by New Hampshire RSA 125C.

What if the community needs more information or time? During the comment period, the community members may want to call you or the state agency to get more information or ask questions. This informal communication is a great opportunity for you to discuss and understand their questions or concerns. The community can also request an extension of the comment period from the state.

What happens after the comment period ends? Comments are reviewed by the state environmental agency. If no comments are received, the state will go ahead and finalize the PrintSTEP Agreement. If comments are received, they will be reviewed by the NHDES and the community to address any issues or conflicts. To do this, the state may hold a public meeting¹. You can also make changes to your application to address comments.

A Public Meeting May Be Held

Why would there be a meeting? A meeting provides an opportunity for you to discuss and resolve any comments in an open forum with members of the community and the state. If, based on the comments, the state determines a public meeting is needed, the state agency will arrange the meeting. The public will be notified about this meeting by notice. A notice shall be published once, at least 30 days prior to the hearing, in a newspaper of general circulation in the immediate area in which the site is or would be located.

What will be discussed at the meeting? The goal of the meeting is to work together with the state agency and community members to address everyone's concerns. This meeting focuses only on your PrintSTEP application, and not on overall environmental issues in the community such as traffic congestion, noise, odors, or overall cumulative impacts. While these issues can be very important to a community, they probably cannot be addressed by one printer alone. However, the regulatory agency, possibly with your help, can assist the community to find out who to contact for help on such topics.

Keep in mind that PrintSTEP encourages a dialogue among all parties so that issues can be raised and addressed in a way that meets everyone's needs. Hopefully, the PrintSTEP Agreement will be agreeable to everyone. If any issues remain unresolved, the state will make the final decision on the printer's PrintSTEP Agreement.

¹PrintSTEP public "meeting" also includes the term "hearing" as defined by New Hampshire RSA 125C.

Printers with Full Public Involvement Requirements

See Figure 3 for an overview of the Full Public Involvement requirements. Full Public Involvement requirements are similar to those for Limited Public Involvement, but require both general and actual public notice and an extra round of review.

The Public Receives Notice and Comments on the Application

As in Limited Public Involvement, the public will receive notice of your application and, if interested, can submit comments. In addition to General Notice, Actual Notice will be provided to the community and registered parties. A copy of the published notice will be sent to the applicant, EPA, an appropriate official of the city or town where the facility is (or would be) located, the local health officer, the regional planning agency, the Federal Land Manager, and persons on a mailing list (PrintSTEP Registry) developed by NHDES which includes all persons who request in writing to be on the list. In addition to the information required for a General Notice, the public notice shall contain the following information: 1) The name, address, and phone number of the person to be contacted for further information; 2) A statement that any person may request a public meeting and an explanation of how to request such a meeting; 3) The number of allowances authorized pursuant to 40 CFR 73.10 (b) for any acid rain affected source; 4) The name and address of the permitting authority; and 5) The identity of the source.

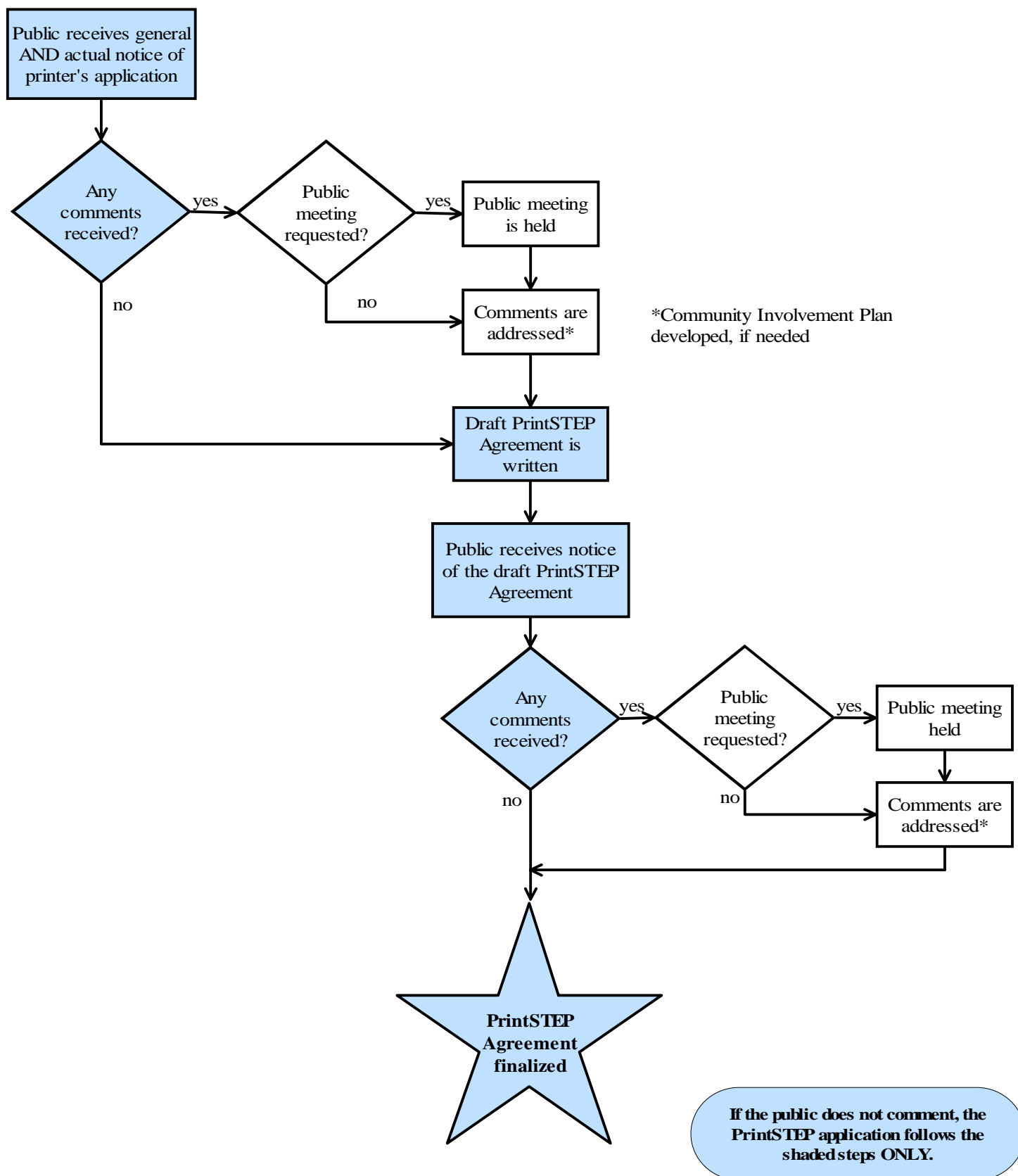
A Public Meeting May be Held

As in Limited Public Involvement, the state determines if a public meeting is needed to discuss the application. A Community Involvement Plan may also be developed.

Comments are Addressed

The state, community and printer will work together to address any issues or concerns brought up at the meeting and in the comments. Responses to all formal comments will be documented by the state and will be publicly available through the Information Repository.

Figure 3
Full Public Involvement Requirements



The Public Comments on the Draft Agreement

The public will be asked to comment again. This time, they will be commenting on the draft Agreement, not on the application. The public will be notified through General Notice, and registered parties and those who commented during the first round of comments will receive Actual Notice. The draft Agreement will be available in the Information Repository. The deadline for written comments and/or public meeting requests shall not be sooner than 30 days after the publication of notice.

A Second Public Meeting May Be Held

If, based on the comments, the state determines a public meeting is needed, the state will arrange the meeting. The notice shall be published once at least 30 days prior to the hearing in a newspaper of general circulation in the immediate area in which the site is or will be located.

Comments are Addressed

The state, community and printer will work together to address any issues or concerns brought up at the meeting. The state may make changes to the draft PrintSTEP Agreement. Responses to all formal comments will be documented by the state and will be publicly available through the Information Repository.

Keep in mind that PrintSTEP encourages a dialogue among all parties so that issues can be raised and addressed in a way that meets everyone's needs. Hopefully, the PrintSTEP Agreement will be agreeable to everyone. If not, anyone who submitted comments may appeal the Agreement. If any issues remain unresolved, the state will make the final decision on the printer's PrintSTEP Agreement.

Your PrintSTEP Agreement is Finalized

- ⇒ The NHDES agency will finalize your PrintSTEP Agreement.
- ⇒ The PrintSTEP Agreement will contain all your requirements for process waste water, hazardous waste, storm water, and air emissions. The Agreement replaces your current permits and approvals for these media.
- ⇒ When final, the state will send you your PrintSTEP Agreement. When you receive it, you're a PrintSTEP participant!
- ⇒ As a PrintSTEP printer, you must operate your facility following the requirements in your PrintSTEP Agreement. These are enforceable limits on your emissions.
- ⇒ The NHDES will file the PrintSTEP Agreement (except for Confidential Business Information) in the Information Repository.